

STATE OF MARYLAND

\*

NO. C-10-CR-23-000516

v.

\*

IN THE CIRCUIT COURT FOR CM

RUBEN ALONSO HERNANDEZ-LAINEZ\*

FREDERICK COUNTY, MD

\* \* \* \* \*

**STATE'S DISCLOSURE WITHOUT REQUEST**

1. The State has provided to the (Defendant) or (Defense counsel) all items within Maryland Rule 4-263 and objects to any request outside Maryland Rule 4-263. The State further acknowledges its continuing duty to supplement Discovery promptly upon receipt of further discoverable information, pursuant to Maryland Rule of Procedure 4-263 (j).

2. Initial discovery pages 1-324.

3. 2 Zip files:

a. 911 Call

b. SAFE pictures

4. Witnesses for the State:

a. Det. Rebecca Skelly, FPD, 100 West Patrick Street, Frederick, MD 21701

b. Claudia Campos De Robles, c/o SAO, 100 West Patrick Street, Frederick, MD 21701

c. Iris R. Wilkerson, 103 Fieldstone Ct, Frederick, MD 21702

d. Ofc. Jacob Haynie, FPD, 100 West Patrick Street, Frederick, MD 21701

e. Ofc. Ethan Ramos, FPD, 100 West Patrick Street, Frederick, MD 21701

f. Ofc. James Dodson, FPD, 100 West Patrick Street, Frederick, MD 21701

g. Ofc. Isaac Bonneville, FPD, 100 West Patrick Street, Frederick, MD 21701

h. Ofc. Christopher Corrado, FPD, 100 West Patrick Street, Frederick, MD 21701

i. Michael A. Valverde Morales, 1208 Alban Court, Apt 1d, Frederick, MD 21703

- j. Ricardo Pineda, 1208 Alban Ct. #1D, Frederick, MD 21702
- k. Rachel Guy, FNE, FHH, 400 W. 7th Street, Frederick, MD 21701
- l. Dr. Rachel Reubens, 400 W. 7th Street, Frederick, MD 21701

Tammy M. Leache /s/  
TAMMY M. LEACHE  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 12<sup>th</sup> day of July, 2023, a copy of the foregoing State's Disclosure Without Request was sent via MDEC, a bulk download link via evidence.com and/or Citrix, a secure file sharing service, to the designated e-mail address and/or service contact for Rachel Reyes, Esquire, the Attorney for Defendant herein.

Tammy M. Leache /s/  
TAMMY M. LEACHE  
ASSISTANT STATE'S ATTORNEY